

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DALONTE WHITE)	CASE NO. 1:17 CV 1165
)	
Plaintiff)	JUDGE PAMELA A. BARKER
)	
v.)	MAGISTRATE JUDGE GREENBERG
)	
CITY OF CLEVELAND, et al.,)	DECLARATION OF KATHERINE
)	L. KEEFER
Defendants)	

1. I am an adult who is competent to make this declaration pursuant to 28 U.S.C.A. § 1746 and I have first-hand knowledge of the facts set forth herein.

2. I am an attorney duly admitted to the practice of law in the State of Ohio. I have been in practice since 2011 and have no disciplinary history. I am one of the counsel of record for Defendants Beveridge, Kubas, Schade, Shoulders and Santiago in the above-captioned case.

3. At no time did I harass, oppress, intimidate, bother, threaten, tamper with or interfere with any witness in this case, including Colleen Allums.

4. Neither I nor any other person associated in any way with any of the Defendants in this case or the City of Cleveland Law Department, to my knowledge, ever asked, hinted, suggested, directed, condoned, approved of, knew about, sanctioned, or authorized, that any other person, including but not limited to individual defendants in this case, any present or former member of the City of Cleveland Law Department, or any present or former member of the Cleveland Division of Police, intimidate Colleen Allums or tamper with her as a witness in any way.

5. I am not aware of any facts or circumstances that would tend to support in any way the accusations about witness intimidation in the Declaration of Brian Bardwell filed on June 2, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on
June 3, 2020.

S: Katherine L. Keefer

Signed, KATHERINE L. KEEFER